



(1) all written correspondence exchanged between Great West Casualty Company and Marshall pertaining to Bendyk and/or Plaintiff Michael Gregg; (2) all written correspondence exchanged between Great West and Marshall pertaining to File Number Q18991; (3) all invoices pertaining to File Number Q18991; (4) all internal written correspondence pertaining to File Number Q18991; and (6) all payments received by Marshall Investigative Group from Great West Casualty Company in the last five years pertaining to investigation of personal injury claims.

See Doc #38, Ex A

5. These requests are protected by the work product doctrine, not relevant to any claim or defense in this case, and the information requested is inadmissible at trial. Plaintiff is not entitled to: written correspondence pertaining to Plaintiff Michael Gregg, invoices pertaining to Marshall's investigation of Plaintiffs, internal written correspondence, and/or all payments received by Marshall from Great West Casualty Company in the last five years.

6. Marshall should not be forced to disclose protected communications to satisfy Plaintiff's counsel's curiosities. The information sought cannot possibly lead to the discovery of admissible evidence since the business relationship between Marshall and the insurance carrier involved in this case has no bearing whatsoever on the issues presented.

7. Defendants incorporate by reference their previous Motions to Quash, as if fully stated herein. See Doc ## 38, 45, 46, including all Exhibits.

8. For good cause and in the interest of justice, the Second Amended Notice of Deposition and underlying subpoena *duces tecum* should be quashed in their entirety, and the Court should enter a protective order regarding any additional discovery of this nature.

WHEREFORE Defendants B&G Transportation, LLC and Bradley Olson respectfully pray this Court enter an Order quashing Plaintiff Bendyk's Second Amended Notice of Deposition and Subpoena *Duces Tecum* to Marshall Investigative Group or in the alternative grant a Protective Order limiting the scope, and for such further relief the Court deems just and proper under the circumstances.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been filed upon the court's electronic filing system this 15th day of April 2021 to:

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